

PROBACTIVE™

December 14, 2005

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Office of Nutritional Products, Labeling
and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition (CFSAN)
Food and Drug Administration,
5100 Paint Branch Parkway
College Park, MD 20740

Dear Sir or Ma'am,

This is a notice in accordance with 21 CFR 101.93 that we intend to make structure function claims as follows:

The name and address of the manufacturer, packer, or distributor of the dietary supplement that bears the statement is:

St. Paul Pharmaceuticals, Inc. Garden Grove, California 92841

The text of the statement that is being made is:

NutriSeltzer™ Vitamin C:

- Supports the immune system
- Supports a healthy heart and cardiovascular system

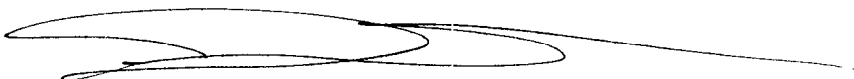
The name of the dietary ingredient or supplement that is the subject of the statement is:

Vitamin C

The name of the dietary supplement (including brand name) is: NutriSeltzer™ Vitamin C

I certify that the information contained in the notice is complete and accurate, and that the notifying firm has substantiation that the statement is truthful and not misleading.

Sincerely,



Jimmy Ngo/President
ProBactive Biotech, Inc.

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